From: PETERSON Jenn L
To: Eric Blischke/R10/USEPA/US@EPA; Burt Shephard/R10/USEPA/US@EPA
Cc: ANDERSON Jim M
Subject: BERA Non-Directive Comments
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Attachments: DraftRIandBRACommentResponseResolution_JPComments.docx

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While I haven't been able to go through all of the comment responses yet, here are my comments on the notes from the meeting. There was one other issue that I did not find in the notes that was discussed in the meeting was the presentation of total DDX versus the individual isomers. While I agree that the risk assessment should present the screening in terms of the isomer / sum that ties with the TRV, failure to screen based on individual isomer will lead to a loss of important information in the risk assessment. The toxicity of DDX isomers varies by receptor; DDE is the driver for birds and DDT is the driver for mammalian toxicity. While the BERA describes the mammalian TRV as a Total DDX value, the TRV is based on EPA Eco SSL derivation for DDT. Water TRVs for example, are based on each isomer meeting the AWQC as well as the total. I would argue that Total DDX detections are not created equal in regard to risk. It will be difficult to line up different lines of evidence in different media (e.g. water, sediment, invertebrate and fish tissue, bird eggs) for those same isomers if the results are presented only by Total DDX. I am not sure about how this was resolved in the RI, but this would also confound nature and extent. DDD, DDE and DDT are also listed as separate hazardous substances for CERCLA and superfund.

Let me know if you have any questions-

Jennifer